

West Dunbartonshire Health and Social Care Partnership Strategic Risk Register 2021 – 2022

| Financial Sustainability/Resource Allocation and Savings Targets | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|--|-------------------------------|---------------------------|------------------------|----------------------------|----------------------|
| <p>Failure to deliver HSCP Board priorities within approved budget incorporating allocated savings targets.</p> <p>Failure to operate within financial parameters in context of continuing and new demand; there is a risk of not being able to (safely) deliver on the Strategic Plan priorities, impact on quality or reduction of service; failure to meet statutory requirements; and potential impact on staff resilience.</p> <p>Failure to deliver efficiency savings targets, as approved by HSCP Board, including as a consequence of savings programmes implemented by other service/divisions of WDC or NHSGGC.</p> | Beth Culshaw; Julie Slavin | | Almost Certain - Major | | Probably – Moderate |
| Mitigating Actions | | | | | |
| A process of managing and reviewing budget by the Senior Management Team is in place; including application of earmarked reserves, analysis of monthly monitoring reports, securing recurring efficiencies, vacancy management, turnover targets and overtime restrictions. | | | | | |
| Financial position monitored through regular reporting to Health and Social Care Partnership Board and HSCP Audit and Performance Committee as set out in the Financial Regulations, Terms of Reference and the Integration Scheme. Including the preparation of the Annual Accounts in line with all statutory requirements and the implementation of any recommended actions identified by external auditors. | | | | | |
| The Integration Scheme requires a recovery plan will be implemented to address areas of significant in-year overspend across all service areas. HSCP SMT, all budget managers/commissioners of service working with WDC and NHSGGC procurement teams on the priorities identified within the procurement pipeline, to ensure that externally purchased services are delivering Best Value. | | | | | |
| Active engagement with Partner Bodies in budget planning process: Scottish Government, WDC and NHSGGC including identifying dependencies and risks on any organisational savings programme and ensure that, where appropriate, HSCP budget managers implement initiatives e.g. FIP (Financial Improvement Programme). | | | | | |
| To continue to engage with forums/groups to identify proposals and consolidate approved policies including eligibility criteria, assessment, charging and financial savings and/or service redesign that may have a negative impact on HSCP services and/or budgets. | | | | | |
| As required by the Ministerial Steering Group, continue to work with Scottish Government, West Dunbartonshire Council, NHS Greater Glasgow and Clyde & Greater Glasgow and Clyde Board-wide Integrated Joint Boards to bring forward notification and approval of budget allocation before the start of the financial year to allow for early identification of actual funding gap to be filled by efficiency savings, service transformation or withdrawal of service. | | | | | |
| A continued commitment to due diligence in all roles; communication and consideration within and between all areas of service; consultation and communication with the public; staff groups and representatives; Health and Social Care Partnership Board members including elected members. | | | | | |
| The delivery of a medium to long term budget strategy for the HSCP and refreshed on an annual basis to reflect the impact of new budget settlements on the delivery of strategic priorities and agreed service improvement programmes. | | | | | |
| A mechanism has been agreed for calculation of set aside budgets this now must be aligned with the draft unscheduled care commissioning plan. | | | | | |

| Procurement and Commissioning | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|--|----------------------|---------------------------|---------------------|----------------------------|----------------------|
| <p>Failure to deliver contract monitoring and management of commissioned services; creates a risk to the financial management of the HSCP and there is a risk to delivery of high quality services and the delivery of quality assurance across all areas of service delivery</p> <p>Failure to manage contracting arrangements; there is a risk that the HSCP has commissioned services which may be out-with contract or contracts are not fit for purpose.</p> <p>Failure to manage contracting arrangements; there is a risk that the HSCP is unable to demonstrate Best Value.</p> <p>Failure to adhere to Financial Regulations and Standing Financial Instructions when commissioning services from external providers.</p> | Margaret-Jane Cardno | | Probably - Major | | Probably - Moderate |
| | | | Unacceptable | | Issue |

Mitigating Actions

- Regular Care Inspectorate reports on independent and third sector providers are presented to the HSCP Audit Committee and HSCP Clinical and Care governance Forum
- Regular Complaints reports are presented to the HSCP Audit Committee, following scrutiny at SMT and HSCP Clinical and Care Governance Forum
- Continued commitment by Heads of Service and Integrated Operations Managers to work with procurement partners to progress the Procurement pipeline work, linking procurement and commissioning of internal and external services. Regular procurement reports will be presented to the HSCP Board jointly by Chief Finance Officer after presentation at WDC Tendering Committee.
- Continued commitment by Heads of Service and Integrated Operations Managers to ensure robust contract monitoring, service review and management as part of the procurement pipeline work linked to the development and review of service led service specifications, reporting mechanisms and the agreed terms and conditions of all contracts.
- The HSCP is in the process of recruiting additional capacity in to this service with a view to further improving commissioning, quality and contract management processes.
- All budget managers and commissioners of services to attend procurement training and have procurement progress as standing item on HOS team meetings.
- 7.6% improvement in compliance in the first half of financial year 2020/21. Improvement from 80.2% in 19/20 – 87.8% in 20/21.

| Performance Management Information | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|--|----------------------|---------------------------|---------------------|----------------------------|----------------------|
| Failure to review and scrutinise performance management information; creates a risk of the HSCP being unable to manage demand analysis, service planning and budget management across totality of the organisational responsibilities. | Margaret-Jane Cardno | | Possible - Moderate | | Unlikely - Minor |
| | | | Adequate | | Acceptable |

Mitigating Actions

- Regular performance reports are presented to the HSCP Chief Officer and Heads of Services for their specific areas of responsibility; this ensures data and information can be considered in terms of legislative developments, financial reporting/governance and the need to prioritise use of resources effectively and anticipate demand.
- Improved performance management reporting presentation, including detailed analyses of those performance indicators that are red and underperforming. Focused scrutiny and challenge
- Quarterly Organisational Performance Review meetings are held with Chief Executives of WDC and NHSGGC.
- Development of robust management information available at service level for frontline staff for ongoing demand management quality control and assurance and to support transformational change.

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| The Commissioning Plan will support the links between finance and planning to meet demand and service delivery within the current financial envelope. |
| Regular performance reports are presented to the HSCP Board by Chief Officer and Heads of Services; providing members of the Board with a range of data and performance information collated from across health and social care systems; this supports governance and accountability; as outlined within the requirements of the Act. |
| Additional performance reports have been introduced to support the recovery and renewal process. |
| Quarterly and Annual Performance reporting has been more closely aligned with HSCP Board meeting schedule to improve the timeous updates on performance across the Partnership, strengthening scrutiny and challenge by the HSCP Board members. |
| NHSGGC has established a monthly performance board in order to further scrutinise high risk areas in relation to waiting time directives. |

| Information and Communication | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|--|----------------------|---------------------------|---|----------------------------|---|
| <p>Failure to maintain a secure information management network; there is a risk for the HSCP that the confidentiality of information is not protected from unauthorised disclosures or losses.</p> <p>Failure to maintain a secure information management network; there is a risk for the HSCP if this is unmanaged or breaches as a result of a GDPR breach; power/system failure; cyber-attack; lack of shared IT/recording platforms; as such being unable to manage and deliver services. Inability to provide service.</p> | Margaret-Jane Cardno | | <p>Possible - Major</p> <p>Issue</p> | | <p>Possible - Moderate</p> <p>Adequate</p> |
| Mitigating Action | | | | | |
| Continued commitment to information management by the Chief Officer and Heads of Service; Integrated Operational Managers and their direct reports must demonstrate adherence to both NHS and Council policies for ICT and data management and procedures; regular learning session on breaches if they occur by individual service areas. | | | | | |
| Confirmation of the appointment of Data Protection Officer for the HSCP Board to support governance arrangements. | | | | | |
| Continued training available for staff groups from both NHS and Council to reflect changes in Data Protection Legislation in May 2018; staff must demonstrate their attendance at Data Protection awareness sessions. Staff are supported to safeguard the data and information which is collected and stored in the course of delivering services and support; there are continued reminders of the need safeguard and manage information. | | | | | |
| Continued training available for staff groups from both NHS and Council with online courses available which staff must demonstrate they have completed via the Council's iLearn or NHS Learn-Pro courses. Staff within the HSCP will complete the course of their employing authority on either an annual (Council) or bi-annually (NHS) basis. | | | | | |
| Autocomplete email address option has been disabled for West Dunbartonshire Council staff, this is an additional safeguard introduced to mitigate data breaches. | | | | | |
| Records Management Plan in place and lodged with National Records of Scotland. | | | | | |

| Outcomes of external scrutiny: Inspection recommendations | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|---|---------------------------|---------------------------|--|----------------------------|--|
| Failure to deliver on recommendations within reports by Care Inspectorate and other relevant scrutiny bodies. | Chief Social Work Officer | | <p>Probably - Major</p> <p>Unacceptable</p> | | <p>Probably - Moderate</p> <p>Issue</p> |
| Mitigating Action | | | | | |
| Improvement action plans for Self Directed Support and Community Payback Orders are being implemented, reflecting findings and recommendations from inspections including specific actions linked to improvement. | | | | | |
| Steps have been taken to recruit an SDS Lead in order to embed SDS activity across the HSCP. | | | | | |
| The My Life Assessment tool has been fully implemented and is subject to ongoing evaluation. | | | | | |
| Review groups for SDS and CPO improvement activity monitor achievement of objectives and service improvements. | | | | | |
| Regular performance and monitoring reports are presented to the HSCP Board/Audit Committee /HSCP Clinical and Care Governance Group as appropriate to support governance and continued scrutiny. | | | | | |
| Staff development and training reflects learning from each inspection report to ensure consistent understanding of duties around delivery of SDS and CPOs. | | | | | |
| New 20/21 – Additional external scrutiny has been introduced in response to Covid 19 – reporting to HSCP board and ongoing monitoring through the internal quality assurance team and external bodies. | | | | | |

The HSCP Boards has agreed additional investment from reserves to support operational managers to deliver on improvement action plans.

| Delayed Discharge and Unscheduled Care | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|--|-----------|---------------------------|--|----------------------------|--|
| <p>Failure to support timely discharge and minimise delayed discharge; creates risk for the HSCP to effectively manage patient, client and carer care.</p> <p>Failure to plan and adopt a balanced approach to manage the unscheduled care pressures and related business continuity challenges that are faced in winter; creates risk for the HSCP to effectively manage patient, client and carer care.</p> | Jo Gibson | | <p>Almost Certain - Major</p> <p>Unacceptable</p> | | <p>Probably - Major</p> <p>Unacceptable</p> |
| Mitigating Action | | | | | |
| A Management Action Plan has been developed to review activity and manage specific actions linked to improvement of planning for delayed discharge. | | | | | |
| A weekly performance report is provided to the Integrated Operations Managers and Senior Management Team; this includes updates on the early assessment model of care and support; effective use of the NHS acute Dashboard; delivery of rehabilitation in-reach within ward settings; provision and usage of Red bags; promotion of Power of Attorney arrangements; commissioning of services linked to free personal care for those under 65 years old and Adult with Incapacity requirements and; delivery of an integrated approach to mental health services. | | | | | |
| An NHS GGC Corporate Vaccination Plan is in place supported by a local vaccination group alongside the local Flu Management and Covid Vaccination Plan; this reflects the HSCP unscheduled care plan for community services which addresses the critical areas outlined in the national Preparing for Winter Guidance. | | | | | |
| A Primary Care Improvement Plan has been developed to review activity and manage specific actions linked to improvement of planning for GP contracting arrangements; this supports effective multi-disciplinary team working within primary care and as part of management of delayed discharge. | | | | | |
| An Improvement Plan to deliver actions linked to Action 15 mental health monies has been developed to review activity and manage specific actions linked to improvement of planning for localised mental health arrangements; this supports effective multi-disciplinary team working within primary care and as part of management of delayed discharge. | | | | | |
| Formal and regular formal scrutiny by SMT and reported to joint NHS and HSCP scrutiny and planning groups linked to UC and winter planning. | | | | | |

| Workforce Sustainability | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|--|---------------|---------------------------|---|----------------------------|--|
| <p>Failure to have an appropriately resourced workforce to meet service demands, caused by the inability to recruit, retain or deploy the workforce with necessary skills, which could potentially lead to disruption of services.</p> | Audrey Slater | | <p>Probably-Catastrophic</p> <p>Unacceptable</p> | | <p>Probably - Major</p> <p>Unacceptable</p> |
| Mitigating Action | | | | | |
| Preventative Controls | | | | | |
| Continued commitment to the implementation of HSCP Workforce and Organisational Development Strategy and Support Plan. | | | | | |
| Robust Operational Management Structures in place and Business Continuity Plans to support service delivery. | | | | | |
| HR policies which reflect best practice and relevant employment legislation to support manager and staff development needs. | | | | | |
| Attendance Management Policies and Staff Health and Well Being Strategies in place. Initiatives accessible to all staff such as Healthy Working Lives, Occupational Health Services and Counselling Services. | | | | | |
| Staff Engagement and feedback through I Matter Survey and action planning. | | | | | |
| Agreed processes for revalidation of medical and nursing workforce and Professional Registration. Policies and procedures in place to ensure staff are meeting professional bodies and organisational requirements for registration. | | | | | |
| Direct Controls | | | | | |
| Sickness absence reporting available to service managers through HR21, Micro strategy, SSTS and Workforce Information Departments. | | | | | |
| Agency / overtime reports | | | | | |
| Measures in place to provide additional emotional and psychological support to help HSCP staff through stressful times. This includes the information and resources which can be accessed via the National Wellbeing Hub. | | | | | |
| HR reports provided to SMT and Joint Staff Forum on HR metrics. | | | | | |
| Workforce reporting integrated into HSCP Performance report to IJB | | | | | |

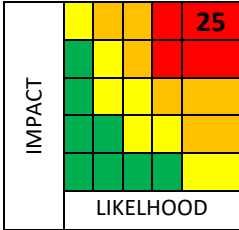
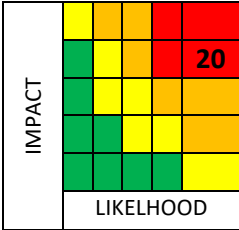
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| Statutory and Mandatory Training reports |
| I Matter reports |
| KSF/ PDP and Be the Best Conversations |

| Waiting Times | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|--|--------------|---------------------------|-------------------------|----------------------------|----------------------|
| Failure to meet waiting times targets e.g. MSK Physiotherapy, Psychological Therapies, Child and Adolescent Mental Health Services and Drug and Alcohol Treatment. | Beth Culshaw | | Probably - Catastrophic | | Probably - Major |
| | | | Unacceptable | | Unacceptable |

| Mitigating Action |
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| Regular performance reports are presented to the HSCP Chief Officer and Heads of Services for their specific areas of responsibility; to review activity and manage specific actions linked to improvement of planning for localised arrangements. |
| Promotion of self-management and co-productive community services including access to online supports and advice |
| Implementation of effective triage processes in place for patients across all areas. |
| Regular performance data collection and monitoring is scrutinised to ensure effective and robust performance management and demand management. |
| Consistent workforce and attendance management across all service areas. |
| The HSCP Board has approved dedicated earmarked reserves to support activity in relation to waiting times initiatives. |

| Brexit | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|---|--------------|---------------------------|---------------------|----------------------------|----------------------|
| Risks across services from BREXIT include difficulty in resourcing some medications, medical devices (instruments and equipment in Hospital) and clinical consumables including disposable and short life goods. There will be an impact on patients and service users and on recruitment to and retention of non-UK EU nationals given that EU citizens require to apply for settled status before 30 June 2021. Prescribing costs and procurement impact. | Beth Culshaw | | Possible - Major | | Possible - Minor |
| | | | Issue | | Adequate |

| Mitigating Action |
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| Establish register of staff that may be at risk, raise issue with Workforce Planning colleagues, core briefs for staff |
| Continue to monitor Brexit status and implement advice and guidance from the Scottish Government to HSCP areas. Reflected in the HSCP EU Exit Action Plan presented to the November 2019 HSCP Board and considered alongside the Council and Health Board plans. |
| New 20/21 National Services Scotland (NSS) has significantly increased their stock levels and secured the supply chain for consumables in response to Covid 19 and Brexit challenges |
| New 20/21 After some initial delays in the first few days imports and exports seem to be operating well and no major shortages identified, this will continue to be monitored. |
| New 20/21 Continue to work with our corporate partners, strong representation at local authority, health and Scottish government groups is essential to help mitigate ongoing risks arising from Brexit |
| The formation of a senior Pharmacy Incident Response Team has been identified to address urgent and emerging issues with medicines supply. |
| Facilities Services continue to maintain a very limited stock of tinned and dried food that is maintained year round, in case of single premise emergencies – while this is not EU Exit specific, it could be utilised in the event of a localised issue being experienced. In addition, catering managers and cooks have their own procurement cards, which they presently use to purchase provisions via Scot Exel Suppliers however, the cards can also be used elsewhere if necessary. |

| Risk of future Pandemic – Covid 19 variations | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|--|--------------|--|--|--|---|
| <p>New 20/21 Risks across services from a future pandemic include difficulty in resourcing medications, medical devices (instruments and equipment in Hospital) and clinical consumables including PPE, disposable and short life goods. There will be an impact on patients and service users and on recruitment to and workforce.</p> <p>Financial Impact – rapid response, prescribing costs, commissioning and procurement impact.</p> <p>Human diseases can take a variety of forms and consequently their impacts can vary considerably both in scale and nature. The main types of human disease that represent new or additional risks to the UK are outlined below. The examples have been chosen to give an impression of the range of possible diseases that would have a significant disruptive effect, but are by no means exhaustive.</p> <p>Pandemic - Influenza pandemics are natural phenomena that have occurred from time to time for centuries. Including Covid 19, this has happen four times in the last century. The symptoms are similar to those of seasonal influenza but may be significantly more severe.</p> <p>Influenza pandemics arise as a result of a new influenza virus that is markedly different from recently circulating influenza viruses and therefore to which few people, if any, have immunity. As a result of rapid spread from person to person, pandemics have significant global human health consequences. In addition to the severe health effects, a pandemic is also likely to cause significant wider social and economic damage and disruption.</p> | Beth Culshaw |  | <p>Almost Certain - Catastrophic</p> <p>Unacceptable</p> |  | <p>Almost Certain - Major</p> <p>Unacceptable</p> |
| Mitigating Action | | | | | |
| Develop, implement and monitor recovery plans for each service –reported to HSCP Board on a regular basis throughout pandemic. | | | | | |
| Develop and monitor pandemic risk framework based on reflection, experience and learning from Covid 19. | | | | | |
| Pandemic objectives that focus on service continuity - workforce health, workforce effectiveness, essential service delivery continuity, citizen/community engagement, financial continuity, partner continuity (both commissioned and third sector), security – physical and digital, reputational monitoring community, workgroups and stakeholder (are the framework elements effective) | | | | | |
| Agile response to monitor continuity of operations and relationships including decision logs and resilience | | | | | |
| Normal life is likely to face wider social and economic disruption, significant threats to the continuity of essential services, lower production levels, shortages and distribution difficulties. | | | | | |
| Individual organisations may suffer from the pandemic's impact on staff absenteeism therefore reducing the services available | | | | | |
| The post- pandemic years provide a very important opportunity to develop and strengthen preparations for the potentially serious impact of an influenza pandemic. The Government is collaborating actively with international partners on prevention, detection and research, and is taking every practical step to ensure that the UK is prepared to limit the internal spread of a pandemic and to minimise health, economic and social harm as far as possible. This includes purchasing and stockpiling appropriate medical countermeasures. | | | | | |
| Apply and comply with Scottish Government and Public Health Scotland guidance and advice – for example Covid-19 the Scottish Government Covid19 Advisory Group, Scientific Advisory Group for Emergencies (SAGE) | | | | | |
| Follow NHS and Social Care mobilisation and planning guidance in Scotland and link this to funding requirements. | | | | | |

Apply integrated emergency management principles, develop flexible and adaptable arrangements for dealing with emergencies, whether foreseen or unforeseen. This will be informed in future by Covid 19 reflection and recovery work.

The delivery of Risk Management table top exercises in order to ensure preparedness for further major incidents.

| Public Protection – Legislation and Service Risk | Risk Lead | Pre-Mitigation Assessment | Pre-Mitigation Risk | Post-Mitigation Assessment | Post-Mitigation Risk |
|---|---------------------------|---------------------------|--|----------------------------|---|
| <p>1. Legislative requirements Failure to meet legislative duties in relation to child protection, adult support & protection and multi-agency public protection arrangements (MAPPAs).</p> <p>Failure to ensure that Guardianship cases are appropriately monitored, supported and reviewed by social workers.</p> <p>2. Service risk and delivery requirements Public Protection Co-ordinator post (vacant from January 2020) provides limited resilience to ensure continuity of public protection functions across West Dunbartonshire HSCP and other responsible agencies</p> <p>Failure to ensure compliance with relevant risk assessments and evidence-based interventions.</p> <p>Failure to ensure that staff are appropriately trained and adhere to standards for risk assessment and risk management across child, adult and public protection work.</p> <p>Failure to monitor commissioned and other partnership services which could impact on an individual's safety or risk to themselves or others.</p> <p>Failure to monitor and ensure the wellbeing of adults in independent or WDC residential care facilities.</p> <p>Failure of staff to recognise, report and manage risk.</p> | Chief Social Work Officer | | <p>Probable - Major</p> <p>Unacceptable</p> | | <p>Possible - Major</p> <p>Issue</p> |
| Mitigating Action | | | | | |
| Review of interim and longer-term arrangements to support child protection and adult protection activity and multi-agency practice arising from vacant Public Protection Coordinator post. | | | | | |
| West Dunbartonshire's Child Protection and Adult Support and Protection Committees ensure child and adult protection procedures are followed and have a scrutiny role over compliance linked to implementation of relevant policies and procedures. | | | | | |
| Chief Social Work Officer attends the North Strathclyde MAPPAs Strategic Oversight Group; responsible manager attends the Management Oversight Group which monitors local compliance with national standards and legislative duties. | | | | | |
| Chief Social Work Officer and Heads of Service ensure that child and adult protection plans as well as MAPPAs risk management plans are regularly reviewed; themes and trends from local audit activity are reported to clinical and care governance structures, the Child and Adult Protection Committees and the MAPPAs Strategic Oversight Group. | | | | | |
| West Dunbartonshire Nurtured Delivery Improvement Group (DIG) – which includes the Chief Social Work Officer – continues to review progress to achieve the recommendations from the joint strategic inspection of children and young people's services (2017). | | | | | |
| Chief Social Work Officer and Heads of Service ensure appropriate systems and processes are in place to ensure that findings of external scrutiny (e.g.: Care Inspectorate) processes are acted upon timeously and appropriately, including the recent inspection of adult support and protection and the forthcoming inspection of Children at Risk of Harm | | | | | |
| Chief Social Work Officer oversees compliance with the PVG scheme. | | | | | |
| Operational teams regularly review their training and development needs, Business Continuity plans and operational risk registers. | | | | | |
| Reviews of children & families and criminal justice social work services reflects actions to reduce risk and uphold professional practice standards. | | | | | |
| Ensure staff are aware that whistleblowing policies and procedures are in place to ensure concerns can be raised and investigated. | | | | | |

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|--------------------|----------------------|-----------------|-----------------|-----------------|--------------------|-----------------------|
| IMPACT OF RISK | (5) Catastrophic | 5 Adequate | 10 Issue | 15 Issue | 20 Unacceptable | 25 Unacceptable |
| | (4) Major | 4 Acceptable | 8 Adequate | 12 Issue | 16 Unacceptable | 20 Unacceptable |
| | (3) Moderate | 3 Acceptable | 6 Adequate | 9 Adequate | 12 Issue | 15 Issue |
| | (2) Minor | 2 Acceptable | 4 Acceptable | 6 Adequate | 8 Adequate | 10 Issue |
| | (1) Insignificant | 1 Acceptable | 2 Acceptable | 3 Acceptable | 4 Acceptable | 5 Adequate |
| | Risk Appetite | (1) Rare | (2) Unlikely | (3) Possible | (4) Probably | (5) Almost Certain |
| LIKELIHOOD OF RISK | | | | | | |